

11/17/21  
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No. 21-739

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IN THE SUPREME COURT OF  
THE UNITED STATES

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Mandeep Singh,  
Petitioner,  
*v.*  
Haerim Won and Microsoft Corporation,  
Respondents.

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On Petition for a Writ of Certiorari to The Supreme  
Court of The State of Washington

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**PETITION FOR WRIT OF CERTIORARI**

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## QUESTIONS PRESENTED

*"...blessed with daughter who I will be showing this world to as you are daughter to your parents..."* - (PetAppK.p87a).

- 1) Are Jan 27<sup>th</sup>, 2019 actions over texts carried out by Won rebuff or harassment of Singh?  
*Commonwealth v. Michelle Carter 474 Mass. 624; Commonwealth v. Inyoung You Mass. (Appeals Court No. 2021-P-0441); Refer PetAppH.p70a-73a for Fighting words & True Threats; Schramek v. Bohren 145 Wis. 2d 695 (1988).*
- 2) Do Washington courts have right to issue protection against a citizen from Oregon state & affirm those rights without establishing facts?
- 3) Was Amendment XIV, Due Process Clause & 18 U.S. Code § 2265 (b)(1) & (2) of the law followed in the court proceedings & law enforcement proceedings itself?
- 4) Are Singh's defending rights violated appearing for the out of jurisdiction hearing with medical condition, wife & daughter asked to stay outside the courtroom while Won's friend stays in the courtroom making hearsay statements?
- 5) Is it unconstitutional to not consider new evidence & testimony in appeal?
- 6) Should the precedent be on the actual causal sequence (Jan 27<sup>th</sup>, 2019 harassment by Won)

of events instead of judgments which are based out of misrepresented & insufficient case facts presented by Won?

- 7) Is it a fraud if citizen from Oregon seeks for protection from Washington State with protection order active against the citizen?
- 8) To bolster the agenda for Chips for America Act, should Microsoft design using Intel's semiconductor process after they hired so many Intel Engineers in last 4 years?

**PARTIES TO THE PROCEEDINGS IN THIS  
COURT**

Petitioner's side:

1. NS, toddler daughter of Singh – Singh representing his toddler daughter. Friend of The Court.

Respondent's side:

1. Microsoft Corporation – Employer of Haerim Won. Conducted hackathon (business event) in Portland, Oregon on Dec 11<sup>th</sup>, 2018 – Dec 13<sup>th</sup>, 2018 where Won was coach of Singh. Won has already been updating Microsoft Corporation on this case all along.
2. Haerim Won is also known as Christy Haerim Won or Christy Won.

**RELATED CASES**

1. Won v. Singh, No. 99840-0, State of Washington, Supreme Court.
  - Judgment entered Sep. 1<sup>st</sup>, 2021.
  - Judgment entered Jul. 16<sup>th</sup>, 2021.
2. Won v. Singh, No. 818139-I, State of Washington, Court of Appeals Division I.
  - Judgment entered May 5<sup>th</sup>, 2021.
  - Judgment entered Feb 9<sup>th</sup>, 2021.
3. Won v. Singh, No. 20-2-03857-1 SEA, State of Washington, King County Superior Court.
  - Reconsideration judgment denied dated Sep. 10<sup>th</sup>, 2020.
  - RALJ appeal denied dated Aug. 21<sup>st</sup>, 2021.
4. Won v. Singh, No. 205-00179, State of Washington, King County District Court.
  - Ex parte Judgment entered Jan. 3<sup>rd</sup>, 2020.
  - Judgment entered Jan. 17<sup>th</sup>, 2020.
  - Judgment entered Dec. 31<sup>st</sup>, 2020.
  - Judgment entered Apr. 5<sup>th</sup>, 2021, amended Apr. 19<sup>th</sup>, 2021.
5. Singh v. Won, No. 20CIV14926KCX, State of Washington, King County District Court.
  - Judgment entered Jan. 20<sup>th</sup>, 2021.
  - Judgment entered Jan. 26<sup>th</sup>, 2021.

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5. APPENDIX E – Fed. Rul. Civil Proc. ....**PetAppE.p49a -p52a**
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## ABBREVIATIONS

1. RALJ - Rule for Appeal of Decision of Courts of Limited Jurisdiction
2. RAP - Rules of Appellate Procedure of Washington State.
3. KCDC – King County District Court
4. KCSC – King County Superior Court
5. CoA – Court of Appeals Div – I of Washington State.
6. PetApp – Petition Appendix
7. MDR – Motion for Discretionary Review
8. FTC – Federal Trade Commission.
9. Wash. – Washington State

**PETITION FOR WRIT OF CERTIORARI**

Mandeep Singh respectfully petitions for a writ of certiorari to review the judgments of the Supreme Court of the State of Washington along with judgments from its lower courts.

**OPINIONS BELOW**

Chronologically:

1. The Supreme Court of the state of Washington denied motion to modify – case # 998400 (PetAppD.p47a).
2. The Supreme Court of the state of Washington denied motion for discretionary review – case # 998400 (PetAppD.p42a).
3. Washington CoA Div-I denied motion to modify to issue protection to Won for 100 (hundred) years on mutual agreement – case # 818139 (PetAppC.p38a - p41a).
4. Amended KCDC issues 10 year protection order based on mutual agreement to issue order for 100 (hundred) years – case # 205-00179 (PetAppB.p29a-p31a).
5. Washington CoA Div-I denied vacating judgment by district court dated Jan 17th, 2020, denied stay trial court proceedings regarding renewal of protection order & denied consolidating KCDC 205-00179 &

- 20CIV14926KCX. CoA Div-I case # 818139 (PetAppC.p36a-p37a).
6. Washington CoA Div-I denied motion for discretionary review – case # 818139 (PetAppC.p32a-p35a).
  7. KCDC denying reconsideration – case # 20CIV14926KCX (PetAppB.p27a-p28a).
  8. KCDC denying protection for Singh – case # 20CIV14926KCX (PetAppB.p24a-p26a).
  9. KCDC renewing protection for Won for additional 1 year – case # 205-00179 (PetAppB.p20a-p21a).
  10. KCSC denying reconsideration in RALJ appeal – case # 20-2-03857-1 SEA (PetAppA.p8a-p9a).
  11. KCSC denying RALJ appeal – case # 20-2-03857-1 SEA (PetAppA.p5a-p7a).
  12. KCSC denying motion for loss or damage of electronic record, motion for sanctions on Won & motion to stay enforcement of trial court decision – case # 20-2-03857-1 SEA (PetAppA.p3a-p4a).
  13. KCSC denying motion for overlength brief & reply brief – case # 20-2-03857-1 SEA (PetAppA.p1a-p2a).
  14. KCDC issues protection for Won for 1 year – case # 205-00179 (PetAppB.p15a-p19a).
  15. KCDC issues temporary protection for Won for 14 days – case # 205-00179 (PetAppB.p10a-p14a).



## **JURISDICTION**

The Supreme Court of the State of Washington denied Singh's motion to modify ruling on Sept 1st, 2021. The Supreme Court of The United States has jurisdiction under 28 U.S. Code § 1257 (a). The petition for writ of certiorari has been timely filed within 90 days of the Washington Supreme Court's judgment.

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

1. **U.S. Constitution Amendment I**  
(PetAppI.p74a)
2. **U.S. Constitution Amendment XIV**  
(PetAppI.p74a)
3. **18 U.S. Code § 2265** - Full faith and credit given to protection orders. (PetAppI.p74a)
4. **28 U.S. Code § 1332** - Diversity of citizenship; amount in controversy; costs (PetAppI.p75a)
5. **U.S. Constitution, ARTICLE III, Section 2:** (PetAppI.p76a)
6. **H.R.7178 - CHIPS for America Act**  
**116th Congress (2019-2020)**  
(PetAppI.p76a)
7. **Rule 10. Considerations Governing Review on Writ of Certiorari: -**  
(PetAppI.p76a)

8. 28 U.S. Code § 1257 - State courts;  
certiorari - (PetAppI.p77a)

### STATEMENT OF THE CASE

Timeline	Singh's Determination Of Purpose of contacting Won
From Dec 11 <sup>th</sup> , 2018 to Jan 27 <sup>th</sup> , 2019	Professional contact & amicable situation for creating intellectual property & reference for possible future employment at Microsoft.
From Jan 27 <sup>th</sup> , 2019 to Jan 2020.	Only seek for closure in civil way from Won on the profane words she used on Singh's sacred values of marriage & God moment meeting with Won. Even after Singh trying all he can to overcome the verbal abuse trauma caused by Won amounting to suicidal thoughts.  In Indian tradition a marriage is not just relation between 2 human beings; rather it is relation between 2 families and also a beautiful soul God has

	blessed us. Won has absolutely no authority to use defamatory (RCW 4.36.120) language on a sacred relation by calling it "sad", "pathetic" with all the "F" words in the entire maliciously harassing & abusive texts.
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#### A. FACTUAL BACKGROUND

##### Dec 11<sup>th</sup> 2018 to June 3<sup>rd</sup>, 2019:

Microsoft Corporation organized hackathon in Portland, Oregon from Dec 11<sup>th</sup>, 2018 to Dec 13<sup>th</sup>, 2018. It was three full day event where participants work on scientific problem statements formulated by Microsoft scientists. These hackathons are not social events, instead these are business events where Microsoft gets an opportunity to learn about their customer's issues related to technology they sell. It also gives opportunity for professionals to learn about new technology Microsoft is introducing and how it can be applied into their field to improve productivity. It is both way learning & improving technology by coaches & participants through collaboration. Ms. Won was coach assigned to a team where Singh was participant. The team comprises of 6

participants. There were roughly 30 teams in that hackathon and most of them were from Intel. Singh respects this commendable effort by Microsoft scientists & engineers.

Singh being engineer at Intel Corporation with 8 years of full-time (not an 8 to 5 job) work experience in semiconductor technology was enthusiastic to learn about artificial intelligence as that is the future and was highly motivated to solve the scientific problem statements that way he can learn & apply the learning to his work of chip processor layout design.

Along with Won's *causation* of interest in Singh, some of the respectable events that occurred Dec 11<sup>th</sup>, 2018 to Dec 13<sup>th</sup>, 2018 strongly *correlated* with Singh's past, 6 years ago at the time.

Strong correlation with the past, & future aspirations of Singh to learn new technology, given Won was also interested in Singh made believe Singh as if it was God moment.

Dec 13<sup>th</sup>, 2018 Won went back to Seattle, Washington. Won knows about Singh's family at this point & also some personal intellectual projects Singh has been working on. All future

communication from this point on is through emails or texts, nothing in-person.

Singh started working on the problem statements from the hackathon on his own as he was excited about solving them. Singh shared couple of links to songs with Won to which Won replied that her boy-friend does not like Singh sending any personal message to her. From this response of Won, Singh got to know that Won has boyfriend and Singh replied with "*no more messages.*"

Couple days later Singh lost the problem statements from the hackathon and contacted Won through email. Won did not reply. Next day in the evening, Singh called Won on the phone and had 40 minutes technical discussion. Won agreed that she will send the problem statements to Singh. In this phone call, Singh also apologized to Won on any misunderstanding asking if Won is still mad at Singh, to which Won replied she is fine. Won did not send the problem statements so Singh followed up in email the next day, there was no response to email. These emails from Dec 19<sup>th</sup>, 2018 & Dec 21<sup>st</sup>, 2018 are there in the evidence in Brief of appellant, dated 4/6/2020, in KCSC appeal. Considering June 11-12<sup>th</sup> 2019 texts, where Won apologizes for not sending the "solutions" to problem

statements (setting wrong narrative), it can be clearly concluded that Won intentionally did not send the problem statements when Singh lost them. If she did not want to send them she should have communicated back to Singh that she will not be able to send but there was no response from her. Given the context, this is clearly coercion by Won for Singh to follow up with her. Last week of Dec 2018, is the start of coercion activity by Won.

For Singh being respectful to Won only wanted to have friendly situation at human level & work professionally, tried to contact Won in Jan 2019. This intent is evident in Jan 15<sup>th</sup>, 2019 email to self that Singh wrote. Jan 19<sup>th</sup>, 2019 Singh tried to contact Won but in return only getting threatening & coercive responses from Won that she will call strict authorities.

Jan 20<sup>th</sup>, 2019 Singh wrote email to Won to which Won significantly threatened Singh & also targeted his character saying Singh is harassing her & she will get restraining order & get Microsoft HR involved. Singh was extremely depressed, felt projected & threatened as he did not know anything about these negative words of harassment, Microsoft HR, police & restraining order. Given, the fact

he is only trying to have friendly situation & maintain professional contact.

Jan 27<sup>th</sup>, 2019, Singh texted Won with positive greeting as Won unblocked Singh. This is Amendment I, constitutionally protected speech by Singh. The response, "*you are obviously delusional f\*\*\*ing psycho*" by Won was extremely threatening equivalent to mental physical assault on Singh. This text message conversation is not at all sequential and in no way comprehended by Singh (because Won was blocking & unblocking Singh) on why would Won target Singh's family and his character given the fact he was only trying to have amicable situation & maintain professional contact. Given, the fact he already apologized to Won on any misunderstanding on Dec 20<sup>th</sup>, 2018. Singh was also extremely concerned about his daughter as Won threatened, "*I'll show you hell*", "*my boy-friend knows you*" (signifies stalking of Singh by her boyfriend/Won herself). This is malicious harassment carried out by Won onto Singh. All profane words of Jan 27<sup>th</sup>, 2019 texts are on record admitted by Won in Jan 17<sup>th</sup>, 2020 hearing, but not in petition presented by Won. Imagine person 'A' physically assaults person 'B'. Person 'A' then uses verbally abusive language on 'B'. How

can anyone conclude that person 'B' is in senses to comprehend any word by person 'A'?

From Jan 27<sup>th</sup>, 2019 till June 3<sup>rd</sup>, 2019 Singh did not contact Won. Singh was coping up with the extreme verbal abuse carried out on him by Won causing suicidal thoughts. Singh made aware about this event to his wife in Feb 2019. Singh's wife was taking care of the infant daughter and bond with her full-time. Since Won's threat of that, "*Singh should expect papers from lawyer & restraining order from police. My boyfriend knows you. I'll show you hell*", Singh was extremely threatened to go to police. Along with that, Singh respecting police, lawyer & court as great profession, Singh did not know anything about these areas. Singh was also respecting privacy of Won, his wife & daughter along with trying to focus on his job. Won claimed in her petition that there is contact between Singh & Won between Jan 27<sup>th</sup>, 2019 & June 3<sup>rd</sup>, 2019, this is false claim by her.

**June 3<sup>rd</sup>, 2019 to Dec 2019:** On June 3<sup>rd</sup>, 2019 thru email Singh tried to explain to Won to take her words back which she has used on Singh's family (*not on him but on his family - "sad marriage", "pathetic marriage", along with additional defamatory words*) to seek for amicable closure. Won failed to give closure



and demanded Singh to get his wife & daughter to Seattle. Singh tried to reach Won's friend that way he can explain it to her friend amicably and seek for some sort of closure and move on. This was also looked at by her friend (Leeann Choi) negatively and she threatened that "*Singh's situation is not going to improve*". Intentions of Singh is very clear that he is seeking for peaceful closure as evident from June 3<sup>rd</sup>, 2019 email, "*Best will be I convey to your friend and move on.*" Since neither Won, nor her friend gave any sort of closure and Won demanded Singh to get his wife & daughter to Seattle along with demanding to pull up the abusive chat conversation, Singh visited Won's big apartment building complex in Seattle that way Singh can explain to Won as a gentleman. Singh never met Won at the time as she was in New York, evident from her timestamps of texts, which is 3 hours earlier. Won calls law enforcement on non-emergency basis.

Presumable law enforcement from Seattle contacted Singh (in Portland, Oregon) over the phone after 2 days. Singh mentioned to the person that he is selling his home, leaving his job & going back to school to find peace that way can support his family for the future. The police officer said to Singh that Won will not

apologize for the profane words she has used on Singh's family and these words are normal, to which Singh was shocked to know and it gave an impression to Singh it is not law enforcement. The person did not advise Singh to seek for protection order for himself, instead Singh was threatened that Won may obtain restraining order from court and Singh will not get a job in big company.

From mid-June 2019, Won & her friend started stalking Singh's twitter & writing cryptic messages on their instagram social media coercing Singh with interest. This stalking & writing of cryptic messages happened all the way through Dec 2019 and presumably started Jan 2019 by Won. Singh only got to know about the cryptic messages in June 2019.

Aug 27<sup>th</sup>, 2019, Singh returned the certificate back to Microsoft where Won was coach. Won got to know about it by stalking Singh's twitter.

In unrelated event, Singh met with car accident where his car rolled over on Sept 21<sup>st</sup>, 2019. The accident aggravated Won's Jan 27<sup>th</sup>, 2019 verbal abuse trauma. This was right before when Singh went back to school to study artificial intelligence on Sept 23<sup>rd</sup>, 2019.

Won obtained police report dated Sept 27<sup>th</sup>, 2019 which Singh is oblivious to. Singh left his full-time job at Intel on Oct 2<sup>nd</sup>, 2019. In Nov 2019 Singh got a call from unknown number where a person leaves voicemail ending with F word, this is presumably someone from Won's side.

Singh was back home in Portland, Oregon from Stanford, California in Dec 2019 for winter break. Singh was happy to be with his daughter and also worried that when will he earn good back again for his family as he is out of job and studying. Singh sent package to Won's friend as a sign of some sort of closure to move on to which again Won called presumable law enforcement on Dec 23<sup>rd</sup>, 2019. To every action by Singh which are part of Amendment I, there is provoking or harassing action by Won. Because of this Singh sought to meet with either Won or her boyfriend or responsible family member or the person who called Singh on the phone that way Singh can get some sort of closure before he goes back to school for start of next academic quarter. With a day left for Singh to go back to California with no closure from Won, coerced Singh with aggravated (due to inflicted trauma by Won since Jan 27<sup>th</sup>, 2019) text response to Won including her friend. Won calls law enforcement again on Jan 2<sup>nd</sup>

2020. Singh talked to presumable law enforcement and asked for the protection order papers to be sent home as he don't want to deal with this back and forth over social media coercion from Won & her friend, Jan 27<sup>th</sup>, 2019 verbal abuse trauma, and all the threats & harassment from presumable law enforcement back in June 2019 where law enforcement did not took any action on Won's Jan 27<sup>th</sup>, 2019 verbal abuse inflicted on Singh.

Won calls Singh on Jan 10<sup>th</sup>, 2020. Singh was unable to answer as he was away. Singh got several text messages from unknown number where the person is asking for lunch and talking in context to the case.

It is to be noted that, in pre-COVID era, all the events in this case are remote after Dec 13<sup>th</sup>, 2018 all the way till Jan 17<sup>th</sup>, 2020 where Won is either in Washington State or New York & Singh is in Oregon or California. This signifies Singh had no bad intension at all towards Won but seek for closure which Won never gave. Singh has not even seen persons who called him on the phone.

Medical condition of Singh is evident from medical report & depression condition of Singh is evident from messages he wrote to himself & twitter messages to overcome the

abuse trauma as proven from scientific studies. Twitter & facebook algorithms can predict a person is in depression or not through social media posts. It is easy to conclude that Singh went in depression with suicidal thoughts because Won rejected & rebuffed him but the court has made a grave mistake by concluding it as rebuff & rejection. The court should not ignore the Dec 20<sup>th</sup>, 2018 *apology* to Won the evidence of which is in Jun11-12<sup>th</sup> text conversation where Won herself acknowledges that Singh did apologize to Won. The court should also not ignore high correlation of intellectual values along with Microsoft creating the environment for Singh where they hired so many engineers from Intel. The court should not ignore the intellectual property Singh wanted to create through consulting Won. The depression is not due to rebuff but it is due to the abusive language & threats Won used on Singh & his family calling him *"ugly soul"*, *"sad marriage"*, *"pathetic marriage"*, *"who the F are you"*, *"I don't give a F"*, *"I'll show you hell"*, *"my boyfriend knows you"*; all this when she was blocking and unblocking Singh. This is clearly harassment & verbal assault by Won and not part of protected free speech.

Full details are in Brief of Appellant dated Apr 6<sup>th</sup>, 2020 & Reply Brief dated Aug 3<sup>rd</sup>,

2020 filed in KCSC appeal case number 20-2-03857-1 SEA & also in KCDC 20CIV14926KCX petition.

Singh do not agree to any of the contents & evidence in KCDC 205-00179 petition from Won.

## **B. PROCEDURAL BACKGROUND:**

### **King County District Court (KCDC):**

Won & her friend (Leeann Choi) obtained temporary protection order on Jan 3<sup>rd</sup>, 2020 through bringing our excerpts, shuffling, withholding & misrepresenting sequence of events. Court issued protection order violating Singh's Amendment XIV without his presence in the court. This is also violation of Singh's **Amendment V** – The Right to Remain Silent. This is also violation of Singh's personal jurisdiction, diversity & subject matter jurisdiction. This is harassment of Singh and his family in and of itself.

Won calls Singh on Jan 10<sup>th</sup>, 2020, given the fact she obtained temporary protection order. Singh was away from phone so was unable to attend. Singh got served in California with protection order petition from Won & her friend with temporary protection approved

and notice of hearing. Singh was more depressed to know about how Won shuffled, misrepresented & withheld many material facts in her petition. Singh was also concerned about how he will be able to study for his tough university course work while going to Seattle and appear for the hearing.

Singh, his wife & daughter appeared for the hearing on Jan 17<sup>th</sup>, 2020 in Seattle. Singh was seeing his abuser Won for the first time after Jan 27<sup>th</sup>, 2019 abuse Won inflicted. Singh's wife & daughter were asked to stay out of the court room while Won & her friend were all charged up setting wrong narrative against Singh. Singh blacked out in the hearing because The Judge showed gesture of denial when Singh was presenting all the evidence he had in his hand. Singh was also shocked to know that Won did not serve any evidence to Singh while The Judge is asking Won to verify the evidence from Singh. Near the end of the hearing Singh tried to offer evidence he had but judge denied it. Since Singh blacked out & was suffering from trauma, appearing for the hearing from California with no sleep for last 12 hours, with Won & her friend being charged up all this made Singh to not respond to the judge's questions or statements the judge was making. Singh also mentioned in this hearing

that he is coming from California. This shows that the KCDC issued protection for Won for 1 year without establishing facts. The factual finding by KCDC was that Singh can appear again in front of Won because there is apartment visitation (this determination by the court has turned out false as none of the terms of the protection order are violated).

**King County Superior Court (KCSC):**

Singh was depressed and shocked about criminal entries being made on his name. Got extremely depressed on how he will get job. Feb 4<sup>th</sup>, 2020 Singh flew to Seattle again to file an appeal. Singh appealed in KCSC and mentioned everything in his Brief of Appellant dated Apr 6<sup>th</sup>, 2020 along with evidence which the judge in district court did not admit when Singh offered it. Singh was unable to hire a lawyer because of high cost & he did not know what type of lawyer to hire for such a case. Not being local to Seattle was another reason. Singh was also of the view that he is already out of job & he would prefer to save the money for her daughter's day care instead of hiring a lawyer. All this happened at the onset of COVID which was extremely uncertain time.

As per RALJ rules, Won was suppose to respond to the Brief from Singh within 30 days, which she failed to. Singh filed motion for sanctions to not allow Won to participate



further in the appeal. To this Won filed Brief from her side 66 (sixty-six) days late from deadline. Why KCSC allowed Brief from Won & conducted oral argument even after Singh filed motion for sanctions? KCSC denied Singh's over length Briefs & considered Won's untimely Brief. KCSC did not consider new evidence & testimony from Singh. This is outright failure to establish facts (RALJ 2.2(d)). With all due respect to The Honorable Court, this is unfair & outright favor to Won.

Singh also mentioned in his Brief of Appellant, dated Apr 6<sup>th</sup>, 2020, Assignment of Errors section, that he is not Washington State resident so the jurisdiction of the case is challenged (PetAppG.p60a-p64a). Singh also mentioned that the petition from Won was not served within appropriate time & location.

It is to be noted here that, it is with new evidence & testimony from Singh the confinements (the Revised Code of Washington (RCW) 10.14.020 harassment definition) under which the protection order is issued becomes insufficient. Singh do not agree to any of the contents of the petition & the evidence from Won which is misleading, excerpts, shuffled & communication context is lost in it. Since there is no rule in RALJ rules to consider new evidence, KCSC was unable to

change the decision of KCDC. Even though Singh challenged every aspect of the petition by Won through evidence.

Shuffled, misrepresented & excerpts evidence where the whole context is lost, especially when the verbal abuse trauma & threatening environment caused & created by Won herself is involved, any evidence from Won can never become a legal fact. It is called lies, perjury. The court cannot and should not call it a *fact* as the KCSC has inaccurately concluded in RALJ appeal.

Singh applies for motion for reconsideration in which Won admits that she did call Singh over the phone on Jan 10<sup>th</sup>, 2020 (RCW 10.14.030 (1) - Any recent contact was initiated by respondent only or by both parties). The reconsideration was also denied. Why would Won call Singh on the phone given the fact how she has vilified Singh in her petition? Why? Won knew that she has lied in her petition all over the place to get protection order against Singh. She knew she has defamed Singh by writing in her petition with possibility of "*rape & murder*"(RCW 4.36.120) which is outright setting wrong narrative & projecting Singh. Singh had no such inhumane thoughts, never conveyed any of such thoughts to Won. Singh clearly & very

respectfully asked Won on the phone in last week of Dec 2019 that he either wants to meet with person who called him, or her boyfriend or responsible family member before he goes back to school for start of next quarter. Washington court is looking at this negatively which is again inaccurate conclusion by them. Won's boyfriend knows Singh through stalking (evident from Jan 27<sup>th</sup>, 2019 verbal abuse by Won), Won is not coming forward to create civil situation even after knowing Singh's reason for contact, Won can target Singh family with profane words so why I should not ask for Won's family member to give me closure when Won herself is not giving me any closure and she is provoking everyone against Singh? Why the court is looking at this negatively? Should Singh digest the abuse by Won on his own?

**Court of Appeals Div-I (CoA):** Singh filed motion for discretionary review(MDR) in CoA bringing the federal question of jurisdiction & challenging the service notice of being too short (PetAppG.p67a-68a) because of which Singh was unable to defend himself. Since the RALJ appeal has no rule to consider new evidence or testimony, it is untenable situation to actually defend.

Meanwhile, Won applied for renewal on Nov 23<sup>rd</sup>, 2020 in KCDC. Singh was concerned about that Won abused & harassed Singh on Jan 27<sup>th</sup>, 2019, causing remaining unwanted events in his life, and it has not been considered accurately by court and now that she has obtained and affirmed protection order through lies is really concerning situation for Singh. Singh filed in protection order papers in KCDC 205-00179 case number but was later told that he should file a new case and pay fee, which Singh did as per the KCDC clerk. The renewal of protection order hearing was initially set for Dec 18<sup>th</sup>, 2020 which was pushed by Won to Dec 31<sup>st</sup>, 2020. Prior to this hearing, Singh filed 3 motions in CoA as the MDR was pending in CoA and CoA can decide on such motions as they have jurisdiction while MDR is pending as Supersedeas Procedure of RAP of Washington State. These motions were stay trial court proceedings of renewal petition, vacate KCDC judgment (Wash. Civil Rules CR 60 (b)) & consolidate KCDC cases. Singh also filed medical report that way CoA can establish facts. Since the service of renewal petition from Won was very close to the MDR oral argument date, it is natural for Singh to file these motions after reading the RAP rules which took 10 days of time. Why the CoA

should not decide on these motions, when KCSC can give 66 days late slack to Won?

In renewal hearing, Singh moved & requested the KCDC to consolidate & transfer the cases to KCSC because of jurisdiction being KCSC as per RCW 10.14.150 (PetAppF.p55a), this was denied. Won lied in this hearing about that she did not call Singh on Jan 10<sup>th</sup>, 2020 given the fact Singh submitted phone call evidence & also Won herself admitted that she called Singh in response to motion for reconsideration in KCSC. These lies in court triggered traumatic flashbacks in Singh. Still renewal for protection for Won approved for another 1 year on Dec 31<sup>st</sup>, 2020 even though none of the terms of the original protection order were violated by Singh.

Singh appeared for his protection order (KCDC 20CIV14926KCX) on Jan 20<sup>th</sup>, 2020. Singh was not given chance to go over the notes he prepared and his phone call dropped 3 to 4 times in the telephonic hearing. The Judge was also swamped with case load. Since there was protection order for Won active, Judge relied on that order which was & stays challenged, Singh was labeled as if he is trying to perpetuate fraud upon court. In that hearing Singh asked the judge to issue protection for Won for one hundred years as

Singh was really depressed to know that the justice system is broken where it supports people who lie in court, this request was denied. Singh filed for reconsideration & submitted the notes which he wanted to go over in the hearing but was never allowed. Singh also asked the case to be transferred to KCSC. This reconsideration & transfer request was denied by KCDC on Jan 26<sup>th</sup>, 2021. Given the fact Singh has legitimate grounds to seek for protection order, should the court rely on judgment from KCDC 205-00179 which is challenged and stays challenged, to conclude on Singh as if he is trying to perpetuate fraud upon court? Moreover, if so is the case, then why KCDC has to reserve the ruling on Jan 15<sup>th</sup>, 2020 (PetAppB.p22a) if they have reviewed the case facts already?

Meanwhile, in Feb 2021, CoA also denied MDR and decision on 3 motions which Singh filed. Singh did not appeal the KCDC 20CIV14926KCX decision as he was emotionally & financially drained out and felt it is better to focus on earning good for his family than dealing with court cases.

Singh filed motion to modify CoA decision to extend protection for one hundred years as he do not want Won to appear in court over and

over and reciting traumatic flash backs after she abusing Singh and then obtaining protection through lies. *Sua sponte* KCDC issues protection order for 10 years. The decision to motion to modify protection order to hundred years was denied by CoA panel of three judges. This decision by higher court is in conflict with decision from lower court.

Singh went in Washington Supreme Court with MDR where he brings the injustice done to him and moves for dismissal of KCDC 205-00179 based on legitimate reasons as per the RCW 10.14.010-030 harassment law & evidence. Singh also explains his loss of intellectual property and how it is directly related to research & development which comes under Chips for America Act. Singh also moved to suppress all evidence from Won as it is shuffled, misrepresented, excerpts & many material facts intentionally withheld (*Rule 1003. Admissibility of Duplicates - United States v. Alexander 326 F2.d 736 (4th Cir. 1964)*). Singh also moved to consolidate review of KCDC 20CIV14926KCX as both these cases are relevant to each other. This MDR was denied. Singh bring motion to modify which was denied by The Department II giving no reason.

**C. Unchallenged Arguments:**

1. Why Won intentionally did not send the scientific problem statements? If she didn't want to send then she should have informed Singh that she will not be able to? This is clearly breach of verbal contract and coercion of Singh given the context.
2. Pre Jan 27<sup>th</sup>, 2019, why Won did not contact law enforcement as she has been extremely threatening Singh about? Instead she took the matter into her own hands. Why Won targeted Singh's family? She has no authority to use profane words on Singh's sacred values. This is clearly malicious harassment of Singh by Won.
3. In June 11-12<sup>th</sup> 2019 abusive texts, why Won did not gave closure by apologizing on the profane words she used on Singh's family? Instead she demanded Singh to get his wife & daughter to Seattle.  
How can Won & law enforcement conclude on its own that Singh has not informed his wife? Home where one dreams a future for a daughter is not sold just like that? My wife is on the home title. Our family's emergency plan was to sell the rental home in case of emergency, where we are currently residing, not to sell our primary home. The abuse by Won causing suicidal



thoughts was way beyond Singhs' emergency plan.

In this June 11-12<sup>th</sup>, 2019 texts Won can be seen transparently using 'F' words on my family. This is clearly unrelenting harassment by Won similar to Jan 27<sup>th</sup>, 2019 harassing and defamatory words by her.

How can Won conclude as if Singh do not care about his family when clearly Singh is saying, *"he want to show his daughter this world as you are daughter to your parents"*? This setting of wrong narrative by Won is intentional by her.

4. In June 2019, why law enforcement did not took any action on Won?

Why law enforcement from Hillsboro, Oregon was not informed & asked to contact Singh? Washington state law enforcement from Seattle is directly calling Singh who is resident of Oregon state. This is Amendment XIV violation of Singh. Why Won has to inform law enforcement when she herself is provoking Singh to get his Wife & daughter to Seattle (evident from June 11-12<sup>th</sup>, 2019 texts)?

Therefore, the contact by presumable law enforcement is not only out of their

jurisdiction but this in and of itself is also harassment of Singh. As per the police officer, it is normal for Won to use 'F' words, threats & profane words towards family.

5. In Sept 27<sup>th</sup>, 2019, why law enforcement issued police report to Won and did not contact Singh at all and kept him oblivious? This is clearly Amendment XIV violation of Singh. This police report must be suppressed as it contains misleading content which is only in favor of Won. Singh do not agree to any of the contents of the police report when he saw it in mid-march 2020 post-trial.
6. Why Won & her friend are stalking Singh on twitter & linkedin throughout the year of 2019, if they have nothing to do with Singh? This is clearly framing & coercing Singh with signs of interests over social media & then in background talking to presumable law enforcement.
7. Why Microsoft HR did not contact Singh once Won informed Microsoft HR back in June 2019 as per Won's petition? Why Microsoft HR did not contact Singh when he returned the certificate back to

Microsoft in Aug 27<sup>th</sup>, 2019? This is negligence on Microsoft's part.

Microsoft & its employee can enforce with their certification onto participants, get all the intellectual information from participants and later leave them to deal with it? Even after explaining everything, Won (Microsoft employee) did not apologize for the profane words she used on Singh's family. Then why Singh have to keep their certification where Won was coach? This is peaceful protest by Singh and is totally lawful. Won cannot claim this as her harassment.

8. Should hiring of so many engineers from Intel Corp by Microsoft Corp be considered valid grounds for Singh to have friendly situation & maintain professional contact with Won pre Jan 27<sup>th</sup>, 2019 for possible future employment of Singh at Microsoft (evident from Jan 15<sup>th</sup>, 2019 email to self)?

Interviews at these companies are tough to crack only to find out later that Won has complained to Microsoft HR against Singh pre Jan 27<sup>th</sup>, 2019 as she has threatened Singh about. *Balan v Tesla*.

9. On similar grounds to point #5 & #8, how will Singh know down the line there is

police report against him to which he was oblivious? *Balan v Tesla*.

10. KCDC protection order issued for Won cannot conclude that Singh was not acting pursuant to any statutory authority when the law enforcement itself has failed to follow the Amendment XIV? Singh has not even seen the law enforcement till date who called him on the phone. The law enforcement is fully available to Won in-person for non-emergency situation on actions triggered by Won herself, but when it comes to Singh they are only available for limited time and that too over the phone. The fact of citizens from different states sprung up in every aspect.

11. Why the court is neglecting Singh's professional life which is very similar to Won's professional life? How can Washington Supreme Court blindly conclude that Singh is making advances towards Won when clearly the evidence suggests maintaining professional contact to get best out of intellectual values? How the court can neglect Singh's professional life where more than half of the life's time is devoted & spent?

12. Why the court is neglecting extreme threatening & coercive environment which Singh was in during the month of Jan 2019 which was created by Won? Any response by Singh that he will not contact Won is because of the extreme threats by Won.

13. Why the court is expecting Singh to digest Won's verbal abuse on its own & now this injustice done?

14. It is clearly established that Jan 27<sup>th</sup>, 2019 verbal abuse by Won is the causal reason for remaining unwanted coercive sequence of events in Singh's life. Had the abuse not occurred, had some closure given, had law enforcement took some action on Won or advised Singh then Dec 2019 would have never occurred.

15. Seeking closure through various communication means where Won blocked Singh throughout is not as if Singh is making undue advances towards Won. Especially when it has been proven so far till date that neither law enforcement nor Washington State courts served justice to Singh. On top of that why Won is stalking Singh throughout?

16. Chips for America Act 2019 did not come into existence just out of thin air. It is things like poaching of Intel employees by big tech companies and these big techs making these employees work on foreign semiconductor technology are one of the strong grounds for Chips for America Act's existence. Cases like Won v Singh is also one reason, where Won is stuck on as if Singh is obsessed with Won (which is outright inaccurate conclusion by her & possibly intentionally setting wrong narrative), while Singh is trying to get best out of intellectual values.

17. Why the court is expecting Singh to bring explicit cases and appeals over and over in court (which will give rise to MDRs & writs) when the court themselves is not following the consolidation rule to save judicial time? Also the court themselves is not considering the evidence from Singh. This is outright favor to Haerim Won. It appears that the court intentionally do not want to establish facts.

18. At any point of time one will only talk about what happened in the past, what is going on in present & a little about future. June 2019 phone call with police one can reasonably draw a conclusion that the

phone conversation would happen on the Jan 27<sup>th</sup>, 2019, June 11-12<sup>th</sup>, 2019 texts & Singh selling his home around the time as evident from home closing statement.

19. In Nov 2021, Singh's family, including wife & daughter were checked second time at U.S. port of entry. The officers asked many times if Singh have weapon, gun or knife. Singh understands the officers are doing their job but this is harassment in and of itself of Singh's family which originated from this case. The court is asking Singh's wife & daughter to stay out of the court room for court proceedings and after that Singh's wife & daughter has to face all this harassment. Singh believes, not sure, that the officers have made some search or entries on Singh's wife & daughter's passport. We are very humble citizens of this country with no thoughts of violence on anybody, let alone thinking of guns, weapons & knives. Washington & National crime database entries must be removed.

20. The Washington Supreme court is claiming that Singh had long term contact with Won which Won never wanted. The court is ignoring the coercion by Won of not sending the scientific problems, unrelenting projections by Won, coercing

and threatening statements and extreme harassment by Won of Jan 27<sup>th</sup>, 2019 targeting Singh's family. Then Won giving no closure to Singh on the words she used on Singh's family and presumable law enforcement not helping. Any negative words from Singh in last week of Dec 2019 are based out of extreme traumatic infliction of injury caused by Won on Jan 27<sup>th</sup>, 2019 and coercion of Singh.

21. CoA claim of KCDC gave sufficient time to Singh to present his case is false. Why Singh has to bring existing authority for remanding the case?

22. Blindly blanket labeling everything under, "*I have nothing do with you*", does not auto waive any of the extremely threatening & coercive environment created by Won.

Instead, a friendly meeting with Won's friend back in June 2019 would have gone a very long way which Won's side doesn't believe in.

#### **REASONS FOR GRANTING THE PETITION FOR WRIT OF CERTIORARI**

**Pursuant to Rule 10 (c) - Considerations  
Governing Review on Writ of Certiorari,**



Washington courts have decided on important question of federal law which involves dispute of citizens from 2 different states and grounds for granting this writ petition.

**Though not part of Rule 10 but somewhat aligns with Rule 10 (a) but on state court of last resort,** The Washington Supreme Court so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for an exercise of The U.S. Supreme Court's supervisory power;

Pursuant to 28 U.S. Code § 1257 (a), as per RCW 10.14.030(1), since Won contacted Singh on Jan 10<sup>th</sup>, 2020 and Won admitted it, signifies Won was never & is in no fear of harm from Singh. Hence Won do not need any protection from Singh. Washington courts failed to ponder upon this evidence.

Washington State courts have no personal, subject matter & diversity jurisdiction over Singh and hence the KCDC 205-00179 must be dismissed *sua sponte* by The United States Supreme Court and this is legitimate & valid defense, given the fact that Washington courts have failed to establish facts and are affirming an

order that originated from Won's lies & Singh's medical condition & situation caused by Won herself at the first place. Subsequent orders in relation to appeal from KCSC, CoA Div-I & Washington Supreme Court must be reversed, rescinded & revoked.

With all due respect to The Honorable Court, pursuant to **28 U.S. Code § 1257 (a)**, the **new evidence must always be considered in the appeal process**, else it becomes untenable situation. The district court don't want to change their stance with new evidence on an order already given, the appellate court don't want to consider new evidence. So it is obvious the outcome will be against appellant and hence unconstitutional. After the trial court, the lies become legal-truth (record) & truth which was not taken by KCDC becomes lies. In the appeal process the judiciary does not want to look at the truth but legal-truth. Petition by Singh which is actual truth is labeled as fraud. This is not justice.

Pursuant to **U.S. Constitution, ARTICLE III, Section 2 and 28 U.S. Code § 1332**, since Won & Singh are residents of different states and there is loss of nearly one million dollars due to Won not sending the scientific problems when verbally agreeing to send, coercing & verbally abusing Singh targeting his family (including daughter & wife) with profane defamatory words

causing mental trauma amounting to Singh's loss of employment with no closure to Singh till date; the personal, diversity & subject matter jurisdiction is under U.S. District Court, it is not under State County District Court. Therefore, are valid grounds for dismissal of KCDC 205-00179.

1. It is clearly established that Amendment XIV of Singh is violated and due process clause of the law was not followed as Washington State law enforcement has no jurisdiction over Singh to make harassing phone calls to him on actions provoked by Won herself, when Singh is Oregon state resident and this is valid defense and grounds for police reports to be suppressed, given the fact the presumable law enforcement did not take any action on Won, or advised Singh to go seek protection order on the actions by Won.
2. It is also established that Singh's Amendment XIV & Amendment V is violated in the Jan 3<sup>rd</sup>, 2020 ex parte hearing where Won obtained protection order against Singh through lies by withholding many material facts of the case. No due process clause of the law was followed, including violation of 18 U.S. Code § 2265 (b)(1)&(2). In this Jan 3<sup>rd</sup>, 2020 order (PetAppB.p13a) it is clearly written, *"Failure to appear at the hearing or to otherwise respond will result in the court*

issuing an order for protection...", thus limiting Singh's liberty. This is threat order from KCDC to Singh when he was in school at the time and has to appear for the hearing in Seattle, Washington from Stanford, California through flight within 5 judicial days of serving. Singh's wife & daughter drove more than 100 miles to appear for the hearing from Portland, Oregon and are asked to stay out of the court room (*See Personal & Subject Matter Jurisdiction in PetAppE.p49a-p52a, Fed Rule Civ Proc Rule 4(K)(1)(A) & RCW 10.14.155(1)(a) in PetAppF.p56a*). Please pay attention to service of notice of hearing & petition. The summons has been served in different state (California) and hence personal jurisdiction is not established. Singh has not auto waived personal jurisdiction even by appearance in Washington courts as it is not volunteer appearance, the court ordered Singh to appear with threats. Any order (*PetAppB.p16a*) stating KCDC has jurisdiction over the parties and subject matter is legally unpersuasive & established after the fact.

Any order on or after this Jan 3<sup>rd</sup>, 2020 materially puts Singh in the wrong eyes of the Judiciary which is unfair to Singh when clearly the facts have not been established & Singh's constitutional rights are violated.

Misrepresentation, excerpts & withholding of material case facts is not a strategy by Won, it is called outright perjury.

3. Singh has not harassed Won. Neither Singh has harassed Won intentionally/non-intentionally nor has Singh harassed Won as per the RCW 10.14.010-030 harassment chapter of Washington State. The existing evidence & testimony on record is insufficient to prove that harassment existed. It is very evident from Singh's written testimony & evidence Singh presented that Singh did had legitimate purpose of creating intellectual property that way he can earn good for his family & empower 2 precious women in his life, given the fact Singh already apologized to Won. Won's verbal abuse, her coercive & threatening words are not rebuff; it is in and of itself coercion & malicious harassment of Singh as defined in RCW10.14.010-030. Jan 27<sup>th</sup>, 2019 event is closer to face 2 face meeting of Dec 13<sup>th</sup>, 2018. Singh feared for his life & family's well-being & was extremely threatened after the Jan 27<sup>th</sup>, 2019 verbal abuse by Won. After coping up & surviving Won's abuse for 5 months, Singh's contact with Won was to seek for closure for the words Won used on his family which Won devoid Singh off and coerced Singh & provoked him into every act which is looked at negatively by

the court. Moreover, as per. law enforcement and Won herself it is normal to use F words and profane words on family.

Furthermore, none of the terms of the protection order has been violated.

4. It is clearly established with evidence that Won intentionally did not send the scientific problem statements around Dec 20<sup>th</sup>, 2018. This is breach of verbal contract (*RCW 4.16.080(3)*) & coercion (*RCW 10.14.010*) of Singh by Won given the context. Microsoft is liable for this breach of verbal contract. Otherwise why would Won talk to me for 40 minutes over the phone for technical matter?

Microsoft is also liable for not contacting Singh when Won informed them about the incident back in June 2019.

Common professional background & Singh's enthusiastic nature to genuinely learn artificial intelligence & work on improving technology cannot & should not be neglected by The Judiciary. As many of Singh's friends & colleagues were hired by Microsoft, it is natural for Singh to also relocate to Seattle and hence have friendly situation with Won for possible future reference for work (Jan 15<sup>th</sup>, 2019 email to self Singh wrote). These

are legitimate grounds for contact pre Jan 27<sup>th</sup>, 2019 and the court has made a grave mistake by concluding as if Singh is making undue advances towards Won. The court is neglecting the apology of Dec 20<sup>th</sup>, 2018. The court has wrongfully concluded that the hiring of so many engineers from Intel does not apply to this case. This brain drain transition is directly & strongly related to this case.

5. Singh has not tried to perpetuate fraud upon court. Singh had legitimate reasons to seek for his protection from Won which is looked negatively by the court. This is unfair on Singh. The court do not want to consider evidence from Singh, do not want to establish facts, do not want to consolidate cases, do not want to issue new hearing, do not want to follow the law set out in their own legislature, denying Singh's briefs in appeal & accepting 66 days late brief from Won; all this is unfair & prejudicial act by the Washington courts and not an issue of Singh to be labeled as if he is trying to perpetuate fraud.
6. The Washington courts claim, by reading the verbatim hearing record, that Singh was treated fairly and was given sufficient time. This in and of itself is unfair and redundant statement to make the order look as if Singh was treated fairly. Singh was not at all

treated...fairly given the fact his medical condition, wife & daughter being asked to stay out of the court room & then Won & Leeann Choi all being charged up in the hearing making loud statements against Singh setting wrong narrative, not taking evidence from Singh, not considering briefs from Singh in KCSC, considering briefs from Won 66 (sixty six) days late in KCSC; all this clearly without any doubt conveys that Singh was not treated fairly.

This is outright injustice to Singh & his family and his defending rights are clearly violated. The situation demands for new hearing de novo.

7. Sua sponte order of 10 years issued on mutual basis must also be rescinded since the orders before has not established jurisdiction & no due process clause of the law followed.
8. It is to be noted that in pre-COVID era everything is remote, this fact in and of itself proves Singh had no bad intentions. If Singh had any bad intention then he would have met Won face to face, moreover the apartment building visitation was more than 6 months ago (On Jan 17<sup>th</sup>, 2020 KCDC judge asking Singh if actions of harassment by Won are within 1 year or 6 months – When it comes to Won the court outright favors her



and when it comes to Singh then it is if her actions are within 1 year or 6 months).

9. As a benefit of doubt the defendant must have Amendment VI rights & also plaintiff has to prove beyond reasonable doubt about the allegations in civil protection order cases where the protection order is easy to get by misrepresentation but its repercussions are so devastating to the defendant (and the family) for rest of their lives. This is significant question of law.

10. The Washington Supreme Court is claiming that evidence against Singh is overwhelming causing great distress to Won. The court is ignoring the fact that Won not sending scientific problems, Jan 27<sup>th</sup>, 2019 verbal abuse, harassment & threats amounting to suicidal thoughts inflicted by Won is the causal impact on remaining sequence of events causing great distress to Singh. In addition, the law enforcement not helping and believing that use of F words & targeting family is normal, Won & Leeann Choi stalking Singh's twitter & linkedin all are causal effects of the sequence of events and hence evidence presented by Won is not overwhelming evidence against Singh & therefore insufficient; Moreover, Singh do not

agree to any of the contents of Won's petition and the evidence presented in it.

Washington Supreme Court Commissioner did say in the oral argument hearing at the end that these are tough types of cases.

11. KCDC 20CIV14926KCX & KCDC 205-00179 must be consolidated and protection for Singh & his family must be granted against Haerim Won. Database entries must be made on Haerim Won's name in the national crime database for harassing Singh with infliction of suicidal trauma amounting to loss of employment with no closure from her side till date. The court must look back and ponder upon did Won apologized for the profane words she used on Singh's family? Did Won or anyone from her side came forward to create peaceful situation? The court must look back that Won obtained protection order through lies & misrepresentation and venturing on Singh's emotional, medical & financial condition.
12. As Judge Amini in KCSC oral argument mentioned that Singh should go settle with Won's employer. Hence Microsoft is included as party to this case in this petition.

13. Intellectual talent flow from Intel to Microsoft is significant. We cannot ask Microsoft to return back the talent, what can be done is to ask Microsoft to use Intel's semiconductor technology for any of the chip designs this talent is designing. Otherwise, we all should be up for foreign semiconductor monopoly. FTC has been informed but not sure how active they are on taking any action on this information.

### CONCLUSION

Mandeep Singh requests that the writ of certiorari be granted by The U.S. Supreme Court and serve equitable justice to Singh and his family.

This case is not about Singh making advances towards Won. It is about empowering woman in Singh's family through collaboration which Won revengefully concluded it as harassment and kept Singh devoid of closure.

Relief sought:

- 1) KCDC 205-00179 must be dismissed *sua sponte* for lack of jurisdiction, violation of Singh's Amendment XIV & Amendment V, violation of his defending rights & courts' failure to establish facts.

- 2) Subsequent orders in the appeal from KCSC, CoA Div I & Washington Supreme Court must be reversed, revoked & rescinded as all orders stays challenged.
- 3) Singh must be relieved from the allegation by court where KCDC claimed that Singh is trying to perpetuate fraud upon court in KCDC 20CIV14926KCX. Singh never had any such intentions.
- 4) Protection order must be issued for Singh & his family against Haerim Won.
- 5) Microsoft/Haerim Won must pay for the damages amounting to losses equivalent of one million dollars. RCW 4.16.080 (2).
- 6) Haerim Won or responsible family member or her boy-friend should apologize to Singh's family for the profane words Won has used & harassment inflicted on Singh's family.

Respectfully & humbly submitted,

*Mandeep*

Dated 11/17/2021

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## APPENDIX